

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 3:24-cv-2688-DWD
)	
\$306,900.00 IN UNITED STATES)	
CURRENCY,)	
)	
Defendant.)	

STIPULATED ORDER FOR FORFEITURE AND FOR RETURN OF PROPERTY

DUGAN, District Judge:

Upon stipulation by the United States of America by and through its attorneys, Steven D. Weinhoeft, United States Attorney for the Southern District of Illinois, and Adam E. Hanna and Kyle C. Oehmke, Assistant United States Attorneys, and Edward Johnson, attorney for Guohai Liu ("Claimant"), the Court hereby finds and orders as follows:

1. On December 23, 2024, the United States filed a *Verified Complaint for Forfeiture* [Doc. 1] against \$306,900 in United States currency in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure and pursuant to 21 U.S.C. § 881(a)(6).

2. The Court issued an arrest warrant *in rem* to be executed by the United States Marshal against the \$306,900 [Doc. 4]. In accordance with 28 U.S.C. § 1355(d) and Fed. R. Civ. P. Supp. G(3)(c), the United States Marshal returned the executed arrest warrant on April 8, 2025 [Doc. 23].

3. On March 6, 2025, the United States sent notice of this action to all potential claimants, including Guohai Liu, Zefeng Liu, Yong Yang, J Chis LLC, and Eric A. Pack, attorney for Guohai Liu, by United States Postal Service First-Class Mail and certified mail [Doc. 3]. On July 17, 2025, the United States sent a second notice by United States Postal Service First-Class Mail and certified mail to J Chis LLC [Doc. 22]. Further, in accordance with Rule G(5), the United States published notice of this forfeiture action on an official government website (www.forfeiture.gov), directing that any claims be filed in accordance with Rule G(5) [Doc. 24].

4. Guohai Liu, through his attorney, Edward Johnson filed a verified claim to the subject property [Doc. 8].

5. That no other persons, or entities have filed a claim of right, title, or interest in the \$306,900 in United States currency, and the Court has defaulted all other parties except for Claimant Guohai Liu. [Doc. 26]

6. The Government and Claimant have agreed to settle this case on the terms and conditions set forth below upon approval of the Court.

7. In full settlement of all claims by Claimant Guohai Liu to the Defendant seized currency, the Plaintiff United States agrees to return \$30,690. The funds shall be returned to the Claimant in accordance with payment instructions to be provided by his attorney in full satisfaction of any and all claims arising out of the seizure of the defendant funds.

8. Claimant acknowledges that his share of the returned funds may be subject to offset as required by the Debt Collection Improvement Act of 1996 (31 U.S.C. § 3176) and further acknowledges that the terms of this agreement do not affect existing tax obligations, fines, penalties, or any other monetary obligations he might owe to the United States of America.

9. The parties further agree that the remaining \$276,210 of the Defendant seized currency claimed by Claimant shall be forfeited to the United States, and the \$276,210 is hereby ordered so forfeited. The United States Marshal shall dispose of the \$276,210 pursuant to law.

10. Claimant Guohai Liu hereby agrees to accept release of the returned funds as full and complete satisfaction of any and all claims which he may have against the United States of America, its agents and employees, and any state or local authorities, arising from this seizure.

11. That this case is dismissed with prejudice with each side to bear their own costs and attorney fees.

12. Claimant releases and forever discharges the United States of America, its agents and employees, and any state or local authorities, from any and all claims, suits, or demands made upon them, of whatever nature, arising out of, or related in any way to, the investigation, seizure, detention, or release of any part of the subject property.

13. That the Court reserves jurisdiction to enforce the terms of this Order.

SO ORDERED.

Dated: November 5, 2025

s/ David W. Dugan

DAVID W. DUGAN
United States District Judge

Approved by:

/s/ Edward Johnson w/consent

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/s/ Kyle C. Oehmke

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/s/ Guohai Liu w/consent

Guohai Liu
Claimant